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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE LARRY A. BURNS)

11 UNITED STATES OF AMERICA,)	Case No. 07CR3104-LAB
)	
12 Plaintiff,)	Date: December 17, 1007
)	Time: 2:00 p.m.
13 v.)	
)	NOTICE OF MOTIONS AND MOTIONS
14 RAMON BARRERA-BECERRA,)	TO:
)	
15 Defendant.)	1) COMPEL DISCOVERY;
)	2) FILE FURTHER MOTIONS
16)	
17)	

17 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and
18 CARLOS ARGUELLO, ASSISTANT UNITED STATES ATTORNEY

19 PLEASE TAKE NOTICE that on Monday, December 17, 2007, at 2:00
20 p.m., or as soon thereafter as counsel may be heard, the defendant, Ramon
21 Barrera-Becerra, by and through his attorney, Gary P. Burcham, will ask
22 this Court to enter an order granting the motions listed below.

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MOTIONS

Ramon Barrera-Becerra, the defendant in this case, by and through his attorney, Gary P. Burcham, pursuant to the Amendments to the United States Constitution, Fed. R. Crim. P., and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) to compel discovery;
- 2) to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: December 3, 2007

/s/ Gary P. Burcham
GARY P. BURCHAM
Attorney for Ramon Barrera-Becerra

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

1	UNITED STATES OF AMERICA,)	U.S.D.C. No. 07CR3104-LAB
2)	
3	Plaintiff-Appellee,)	CERTIFICATE OF SERVICE
4	v.)	
5)	
6	RAMON BARRERA-BECERRA,)	
7	Defendant-Appellant.)	

8 IT IS HEREBY CERTIFIED THAT:

9 I, GARY P. BURCHAM, am a citizen of the United States and am at
 10 least eighteen years of age. My business address is 964 Fifth Avenue,
 11 Suite 300, San Diego, CA 92101.

12 I am not a party to the above-entitled action. I have caused
 13 service of Defendant's Motion For Discovery and For Leave To File
 14 Further Motions on the following party or parties by electronically
 15 filing the foregoing with the Clerk of the District Court using its ECF
 16 System, which electronically notifies him/her.

17 **CARLOS ARGUELLO, Esq.**
 18 **Assistant United States Attorney**
 19 **880 Front Street**
 20 **San Diego, CA 92101**

21 I declare under penalty of perjury that the foregoing is true and
 22 correct.

23 Executed on December 3, 2007.

24 /s/ Gary P. Burcham
 25 GARY P. BURCHAM